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- John Burns
- 2 Annunziato whether you believe that Dave Annunziato
- 3 should be paying for things like your rent and the
- 4 other things that you identified?
- MR. ELLIOT: Object to the form. It is an
- 6 argumentative question.
- 7 Q You can answer.
- 8 A I am not going to answer, it is stupid.
- 9 Q Sir, you just identified what you believed
- 10 were collection costs?
- 11 A I asked you if you considered those if
- 12 those were part of collection costs. I asked you
- 13 what you thought or is it just a cost of three
- 14 people making phone calls and two simple letters
- 15 being sent.
- 16 Q I will back up.
- A few moments ago you testified that
- 18 you would assume that the costs of collection was
- 19 higher than the amounts that were sought from the
- 20 consumers in Plaintiff's Exhibit eight, do you
- 21 remember that testimony?
- 22 A Yes.
- Q What made you make that assumption?
- 24 A Well, first of all, if I took the legal
- 25 cost to defend this case and what we have spent so

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- John Burns
- 2 far and I look at the amount of money that was
- 3 actually collected just considering no other costs,
- 4 we have already spent more to collect than what the
- 5 amount of the collection costs would be.
- 6 Q Okay.
- 7 And what about for a consumer that
- 8 was -- that did not sue Collecto, would you believe
- 9 in that circumstance that the percentage or the
- 10 actual cost of collecting a debt would be higher
- 11 than what you actually sought to collect from that
- 12 consumer?
- MR. ELLIOT: Objection to form.
- 14 A Yes, I would think so.
- 15 Q What would you base that on?
- 16 A Based on my knowledge of what the cost to
- 17 run our business and what the small amount of
- 18 payments have been on accounts like that.
- 19 Q Okay.
- So, for instance, if there was a
- 21 consumer on the list of 484 people contained within
- 22 Plaintiff's Exhibit eight that was charged \$5,000 as
- 23 a collection cost, do you believe that that consumer
- 24 cost Collecto more than that \$5,000?
- MR. ELLIOT: Objection to form.

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- John Burns
- 2 A The answer is, they we are constantly
- 3 looking at our costs, our commissions are set in
- 4 order to be able to recoup our costs and make a
- 5 small 5 percent margin of profit at the end of the
- 6 year. All of this goes into one big bucket. To
- 7 comment on a specific account and a specific charge,
- 8 it is very difficult because it is meaningless in
- 9 the scheme of the overall calculation of what the
- 10 fee rates should be.
- 11 Q But I was asking whether the amount of
- 12 money that you seek to collect from each one of
- 13 those consumers within Plaintiff's Exhibit eight
- 14 whether that amount bore any relationship to the
- 15 actual cost of collection of, we will start with
- 16 Collecto, did it?
- 17 MR. ELLIOT: Objection, asked and
- answered.
- 19 A Collecto has nothing to do with it. This
- 20 is the client telling us, this is the amount that
- 21 they want us to collect on their behalf to pay for
- 22 the service.
- So if the question is, do our
- 24 services warrant that, in many circumstances in this
- 25 client in particular the circumstances would be that

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- John Burns
- 2 we have not been compensated for the work that we
- 3 have done and our expenses are far above what the
- 4 actual revenue was on those particular 484 consumers
- 5 that you have identified.
- 6 Q So it didn't bear any relationship
- 7 whatsoever to Collecto's actual costs of collection,
- 8 correct?
- 9 MR. ELLIOT: Objection to form.
- 10 A You are talking about the actual cost of
- 11 collection and you have not defined it properly.
- 12 Q Correct me if I am wrong, but you just
- 13 indicated to me that the sole purpose --
- MR. ELLIOT: How many different times are
- 15 you going to ask the same question that he has
- 16 already answered?
- 17 Q With respect to the 484 people contained
- 18 within Plaintiff's Exhibit eight, I believe you just
- 19 testified that the only basis for the collection
- 20 cost that was charged to those consumers was based
- 21 and what New York Tech told you, correct?
- MR. ELLIOT: Objection to form.
- A We have a contract with New York Tech
- 24 where we offered to do collection work at certain
- 25 rates based on our experience and knowledge of doing

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- John Burns
- 2 collection work and they agreed to an amount which
- 3 would be their costs. We are collecting an amount as
- 4 to what their costs are to get the work accomplished
- 5 and get it done.
- 6 What it costs us to do that work when
- 7 you take into consideration all of the various
- 8 aspects to get to that point, I am sure our costs
- 9 have exceeded by a significant amount whatever the
- 10 revenue was that was generated.
- 11 Q Okay.
- 12 And the cost that was charged to Dave
- 13 Annunziato of 1,382.79 you believe that that is less
- 14 than the actual cost that it costs for Collecto to
- 15 collect that debt?
- MR. ELLIOT: Objection.
- 17 A That specific debt?
- 18 Q Yes, sir.
- 19 A Well, our costs are handling all of the
- 20 accounts, all of the debt, not a specific account.
- 21 We can't figure our costs based on one, debtor.
- 22 Q Speaking --
- MR. ELLIOT: Now you are arguing with the
- 24 witness, we are done with this subject.
- MR. MAURO: I am not arguing with the

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  1
                            John Burns
  2
           witness.
  3
                MR. ELLIOT: We are done with that
  4
           subject.
  5
                How much did it cost to print the letter
           Q
      that was mailed to Dave Annunziato?
  6
  7
                How much did it cost to print the letter?
           Α
      Oh, I don't know the current numbers, probably like
 8
  9
      60 cents.
10
                How much did it cost to make the phone
           0
11
     calls that you made to Dave Annunziato?
12
                Well, we have to buy a phone system, we
     have to hire employees, we have to get a building,
13
14
     we got to have the building cleaned, we have to pay
     our utility bills we have to do all of that.
15
16
                     If I took all of that overhead and
     related it to this bill, then we probably spent at
17
     least ten times more than what he would have paid to
18
     get to that point.
19
20
               And you believe that that is a collection
     cost that you can seek reimbursement for?
21
22
               MR. ELLIOT: Objection to form.
23
          Q
               Correct?
24
            Collection costs are the costs of doing
          A
    business. You don't take selectively one aspect of
25
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- John Burns
- 2 that to arrive at a particular figure, no one does
- 3 that, no business man does that.
- 4 Q There are students within Plaintiff's
- 5 Exhibit eight that have collection costs of more
- 6 than 3,000, are you aware of that?
- 7 A Yes, I saw some in there.
- 8 Q And the collection methods that were used
- 9 to attempt to collect money from those students, did
- 10 they differ in any significant way from the attempts
- 11 to collect a debt from Dave Annunziato?
- 12 A I don't believe so.
- 13 Q Yet you believe that it is appropriate to
- 14 include your overhead and other costs of running the
- 15 company into collecting the debt from the student
- 16 who owed 3,000 in the same form?
- MR. ELLIOT: What do you mean by
- 18 appropriate? Are you asking him a legal
- 19 question, now? Objection.
- MR. MAURO: Are you testifying, Joe?
- 21 MR. ELLIOT: This is an inappropriate
- 22 question asked in an inappropriate question,
- asked in an inappropriate and argumentative
- 24 way.
- 25 Q Is it appropriate to charge 3,000 to one

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		Page	147
1	John Burns		
2	consumer and 1,382.79 to another consumer when you		
3	are doing the same collection work for those two		
4	consumers?		
5	MR. ELLIOT: I am going to instruct the		
6	witness not to answer the question. It is a		
7	legal question and his opinion as to what is		
8	appropriate or not appropriate is irrelevant.		
9	I am going to instruct him not to answer.		
10	MR. MAURO: On what basis is that a legal		
11	conclusion? Are you asserting a privilege of		
12	some sort?		
13	MR. ELLIOT: I am instructing him not to		
14	answer.		
1.5	MR. MAURO: Because you don't like the		
16	question.		
17	MR. ELLIOT: Because his opinion what is		
18	appropriate and inappropriate is legal.		
19	MR. MAURO: You believe that is a proper		
20	objection to instruct your client not to answer		
21	the question?		
22	MR. ELLIOT: Yes. You have asked it six		
23	different times six different ways and it is		
24	inappropriate and it is unnecessarily burdening		
25	the witness.		

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		Page	148
1	John Burns		
2	THE WITNESS: Plus I have already answered		
3	the question five times.		
4	MR. ELLIOT: And it is not relevant to		
5	anything.		
6	MR. MAURO: Are you going to waive your		
7	arguments if I make an argument along these		8
8	lines then, Mr. Elliot?		
9	MR. ELLIOT: I don't know what you are		
10	talking about.		
11	MR. MAURO: Let me ask the questions.		
12	MR. ELLIOT: He is not answering that		
13	question.		
14	MR. MAURO: And you have no privilege that		
15	you are basing that are on, that instruction		
16	not to answer. I want it clear for the record		
17	because I intend to bring this issue to the ask		
18	the Court to address why you were instructing		
19	your client not to answer because you feel		į
20	MR. ELLIOT: It is not a proper question.		
21	MR. MAURO: And you feel it is a proper		
22	instruction to give your client that he should		
23	not answer because you don't like the question?		4
24	MR. ELLIOT: No.		
25	MR. MAURO: There is no privilege that you		

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Page 149 1 John Burns 2 have identified. 3 MR. ELLIOT: I am saying it is beyond the 4 scope of the deposition. 5 MR. MAURO: That is the first time you said that. I will ask the question again. If 6 you want to instruct your client not to answer, 8 I intend to raise it with the Court. 9 Do you believe that it is appropriate for your company Collecto, Inc. to charge one student 10 contained within Plaintiff's Exhibit eight one 11 collection fee and a different student within 12 Plaintiff's Exhibit eight a different fee when you 13 14 do the same work to attempt to collect that fee? 15 MR. ELLIOT: I am instructing him not to 16 answer. 17 I would like to make my comment. 18 We charge the client for the work that we perform. We don't charge the student. We 19 are not charging the student, we are charging our 20 21 clients. 22 Our client has a relationship with the student, they have established the fact that 23 whatever the cost of collection is is what they are 24 going to be seeking to be paid. 25

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- John Burns
- 2 We have no negotiation with the
- 3 student, we -- all we do is we try to collect the
- 4 account and then the client pays us based on
- 5 whatever contractual arrangements we have.
- 6 Q The collection costs that you are charging
- 7 don't bear any relationship to Collecto's costs,
- 8 actual -- I will restate that.
- 9 The collection costs that you
- 10 attempted to collect from the students contained
- 11 within Plaintiff's Exhibit eight don't bear any
- 12 relationship to the actual costs of collection of
- 13 Collecto, is that right?
- MR. ELLIOT: Objection to form.
- 15 A No.
- 16 Q It is not right?
- A No, we don't collect just for New York
- 18 Tech accounts, we collect for 2000 clients and we
- 19 have one million consumers that we are dealing with.
- It isn't as simple as saying, oh,
- 21 this particular person responded on the first letter
- 22 and made the payment on the account, and we will
- 23 give them a discount.
- 24 Q In figuring out how much to put as a
- 25 collection cost on the letters that you mailed to

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- John Burns
- 2 the people contained within Plaintiff's Exhibit
- 3 eight, did Collecto, Inc. consider in any way
- 4 whether what the actual cost of collection for
- 5 Collecto would be for those students?
- 6 A That information is reflected in the fee
- 7 rate that we charge the client.
- 8 Q But for each individual consumer within
- 9 Plaintiff's Exhibit eight that was not a particular
- 10 consideration, correct?
- 11 A Yes, that is correct, yes.
- 12 Q Now, do you have any knowledge about what
- 13 the actual cost of collection of New York Tech would
- 14 be for those particular students?
- 15 A No.
- Q Calling your attention to Exhibit five
- 17 which is the collection agreement between New York
- 18 Tech and Collecto, there is an addendum B in that
- 19 document for collection charges, do you see that,
- 20 sir, Plaintiff's Exhibit --
- 21 A I saw that, yes.
- 22 Q Plaintiff's Exhibit five?
- 23 A Yes.
- Q Why do you include that addendum on your
- 25 contract?

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\$1,223.11	\$2,354.00	\$1,254.49	\$1,246.16	\$3,376.12	\$3,712.50	\$1,327.50	\$8,171.00	\$8,128.25	\$2,000.00	\$1,529.87	\$3,169.60	\$4,026.25	\$6,914.50	\$1,699.63	\$8,694.50	\$1,739.18	\$523.33	\$2,157.50	\$2,612.80	\$2,185.00	\$3,160.54	32,656,50	\$8,936.75	\$9,384.00	\$3,976.69	\$5,307.50	\$2,621.50	\$1,795.00	\$9,504.87		

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\$4,260.74	\$3,604.14	\$7,789.00	\$3,416.50	\$1,832.34	\$2,594.17	\$2,530.00	\$3,908.00	\$2,823.75	\$5,990.00	\$2,509.04	\$3,373.70	\$3,483.75	\$2,996.00	\$3,863.88	\$1,317.00	\$669.50	\$3,761.18	\$3,568.50	\$913.00	\$3,187.50	\$6,729.32	\$4,200.00	\$811.00	\$500.00	\$1,634.25	\$1,275.00	\$3,356.00	\$11,422.00	\$1,834.00	THE RESIDENCE TO SELECT

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	New York	Brooklyn	west Sayville	DESIGNATION OF SERVICE	Wast Hampston	Brooklyn	Westbury	NO. ACM.	New York	Centereach	New York	Roosevelt	Patchoque	Fresh Meadows	Holbrook	Brentwood	Drooklyn	oraten Island	Charles	of Brook	\perp	_	Riverhead	Roosevelt	L	_1	_	Central Islip	Bay Shore	Glen Cove	Massabequa	Brooklyn	Raynort
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Delavale	Greene Lee BEAUMONT	FULMORE Lee	RUSSO Rahman	Gonzalez Castro TUCCI	MCNEAL MCLeod TRICOCHE Smith	
	4	we Apt	312 E 91st St Apt 2e 1053 Quincy Ave 843 E 213th St	18 Jacobus PI Apt 6b 4245 77th St FI 3 170 Whitewood Dr	463 Main St Apt 2a Farmi 4612 Avenue K Brook 111 Woodale Ave Peeks 1001 Jerome Ave Act 7-15	
Brooklyn NY Glen Cove NY	anor	다	ork Park	<u>a</u>	Farmingdale Brooklyn Peekskill	
11575-1119 11203-5601 11542-1613	11354-5520 10075-0528 11530-4908		NY 11762-4048 NY 10128-5360 NY 10465-1914	NY 10452-5784 NY 10463-6837 NY 11373-2947	NY 11735-3571 NY 11234-2010 NY 10566-5522	
DEF 47689853 NYT100 DEF 47630414 NYT202 DEF 51438451 NYT200	DEF 48969034 NYT202 DEF 48134423 NYT202		╼┾╌┼	DEF 48128869 NYT202 DEF 51186548 NYT202 DEF 48128747 NYT202	DEF 46335138 NYT202 DEF 51186572 NYT202 DEF 44851614 NYT202	
\$1,831.25 \$1,195.50	\$2,141.86 \$3,559.07 \$1,614.79	\$2,213,75 \$7,283,00 \$4,200,00	\$2,310.00 \$3,702.62 \$2,817.00	 	\$1,889.37 \$5,465.76	

\$683.57	\$0.00	\$4,096.29	\$1,587.86	\$719.68	\$960.71	\$2,922.65	\$0.00	\$4,205.83	\$1,028.57	\$252.29	\$2,192.14	\$3,428.57	\$1,972.23	\$374.89	\$1,330.4	\$2,213.5	\$1,079.9	\$956.7	\$713.3	\$842 9	\$358.6	\$744	\$5,398	\$704	\$169	Ong Coli Coli B		
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\$2,585.92 \$768.43 \$1,617.86 \$2,533.93 \$1,767.86 \$533.57 \$1,463.57 \$1,336.11 \$545.79 \$370.60 \$8,639.14 \$835.93 \$1,465.71 \$309.54 \$1,301.79 \$1,301.79 \$1,581.71 \$2,298.00 \$1,581.71 \$3,751.50 \$1,698.43	\$1,440.91 \$294.68 \$578.57	اعة إذ
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\$289.29	\$2,103.97	\$3,166.13	\$1,239.00	\$408.64	\$635.40	\$2,084.00	\$373.55	\$519.75	\$4,899.32	\$1.078.87	\$793.13	\$484.69	\$2,178.00	\$0.00	\$2,855.57	\$1,303.93	\$550.65	\$585.00	\$1,108.93	\$851.59	\$2,375.68	\$875.50	8429.72	\$1,289.79	\$1,910.00	\$829.29	\$1,318.34	\$424.29	\$2,606.04	

\$549.86	\$1,486.20	\$411.89	\$526.07	\$363.05	\$2,745.54	\$2,100.29	\$755.14	\$3,083.57	\$977.10	\$2,092.85	\$4,734.00	\$2,191.33	\$1,183.29	\$1,402.67	\$492.10	\$855.00	\$996.81	\$1,778.00	\$1,170.86	\$1,009.20	1.891	\$2,014.29	\$1,147.50	\$461.37	\$5,440.72	\$96.4	\$1,447.7	\$527.2	\$642.8	
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2,325.00	1,828.17	\$418.83		\$292.93	\$2,827.82
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\$0.00	\$1,844,62	\$720.64	\$684.85	\$1,938.42	\$884.66	\$1,082.57	\$490.98	\$1,438 14	\$1,069.23	\$768.21	\$875.33	\$556.71	\$82.14	\$797.52	\$580.71	\$1,538.78	\$599.36	\$867.14	\$652.35	\$1,049.03	\$827.14	\$1,345.71	\$1,475.57	\$427.71	\$1,211.60	\$109.71	\$1,773.21	\$72.86	\$767.29	
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₹240.00	\$512.36	548 9.18	\$795.00	\$692.05	\$1,525.32	\$642.31	\$1,800.00	\$2,427,67	\$885.44	\$844.77	\$1,586.84	\$990.00	\$1,930.71	\$1,051.87	\$349.06	\$2,34247	\$724.00	

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